

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CRAIG GOULET

Plaintiff,

v.

NEW PENN MOTOR EXPRESS

Defendant

and

TEAMSTERS LOCAL 25

INTERNATIONAL BROTHERHOOD OF
TEAMSTERS

Defendant,

CIVIL ACTION
NO. 04-12577-WGY

**DEFENDANT, INTERNATIONAL BROTHERHOOD OF TEAMSTERS, LOCAL
25'S, PROPOSED VOIR DIRE QUESTIONS**

1. This is a suit against New Penn Motor Express and Teamsters Local Union 25 in which the Plaintiff, Craig Goulet, claims that New Penn violated a collective bargaining agreement and Local 25 breached its duty to represent him fairly under that contract. New Penn states that it did not violate any contract and Local 25 states it did not violate its duty of fair representation.
2. Is there anyone here who would prefer not to sit on a jury concerning a case of this kind?
3. Do you know or have you read anything or heard anything about this case, the Plaintiff or the Defendants or any of the lawyers involved in the case?

4. Craig Goulet lives in Hudson, Massachusetts. Do any of you, or does anyone close to you, know Mr. Goulet or any member of his family?
5. Are you, a member of your family or any close friend or acquaintance employed by New Penn, Local 25 or any union?
6. This case involves the relationships between an individual, his employer, and his union. How do you feel about unions in general?
7. Are you, a member of your family or any close friend or acquaintance an officer or official in any union?
8. Are you, a member of your family or any close friend or acquaintance a member of any union?
9. Have you, or anyone close to you, ever file a grievance while a member of a labor union? What was the disposition of the grievance, if you recall?
10. Do you believe that unions should be supported whether they are right or wrong?
11. Do you agree or disagree with this statement: most unions are too powerful
12. Have you, or anyone close to you, ever refused to join a union? If so, please tell us about it.
13. Do you believe that unions are generally a bad influence in our society?
14. Do you believe that unions should be opposed whether they are right or wrong?
15. Have you, a member of your family, or any close friend ever been suspended or expelled from a union?
16. Did you ever file a lawsuit against a labor union or file unfair labor practice charges against a labor union at either a federal or state administrative agency or in state or federal court?

17. Have you, your spouse, family members or any close friends ever sued a union?
18. The union in this case is Teamsters Local 25. Do you have any opinions about the Teamsters Local 25?
19. Have you, or anyone close to you, received Social Security disability benefits?
20. Have you, or anyone close to you, ever received worker's compensation benefits?
21. Have you, a member of your family or any close friend or acquaintance ever been sued?
22. Are any of you acquainted in any way with any other prospective juror in this case?
23. Do you know anybody else here in the courtroom or at the courthouse?
24. Do you know any of the following individuals: Craig Goulet, William Carnes, George Cashman, Mark Harrington, Doug Francey, Janet MacLaughlin, Burton Trebour, Paul Dubiel, Andrew Kerlik, Charles Zaccaria, Scott Lathrop, Carl Gluek, Matthew Dwyer, or Kathleen Pennini?
25. Would you be willing to not award money if you believed the plaintiff sustained no loss?
26. Would you tend to favor one side or the other in this case without regard to the evidence which may be presented?
27. Does anyone think that because the plaintiff has brought this lawsuit the defendants must have done at least something wrong?
28. Is there anyone here who thinks that everyone who files a lawsuit is entitled to an award from a jury?
29. In this case, you are going to hear conflicting testimony. That is, you will hear disagreements between witnesses. Part of your duty as a juror is to determine a

person's credibility. You will have to decide for yourself, who is honest, who is convincing, who is trustworthy. How do you feel about having to decide what the truth really is?

30. Have you ever been in the position of having to decide whom to believe when told directly conflicting stories?
31. Is there anyone here who believes you can tell by a certain sign or expression whether someone is telling the truth?
32. How many of you have served on a jury before?
33. Is there anything about your previous experiences on a jury, or even being involved with the panel and being subjected to questioning by the court and lawyers, that makes you feel that you would rather not sit on a jury again?
34. Is there anything in particular that you do not like about our judicial system, whether it with the courts themselves or the lawyers or even service on a jury?
35. From what little you know about this case at this point in time, would you like to serve on this jury? Why or why not?
36. Is there anyone here, who, for any reason, would like to hear any of the questions again? Would anyone like to have a particular question repeated in private?
37. Is there any reason you cannot reach a verdict in this case based only on the facts and the law?

Respectfully submitted,
For the Defendants,
**INTERNATIONAL BROTHERHOOD
OF TEAMSTERS, LOCAL UNION NO.
25,**
By its attorney,

Matthew E. Dwyer (B.B.O. # 139840)
Kathleen A. Pennini (B.B.O. # 654573)
Dwyer, Duddy and Facklam, P.C.
Two Center Plaza, Suite 430
Boston, MA 02108-1804
(617) 723-9777

Date: June __, 2006

CERTIFICATE OF SERVICE

I, Kathleen A. Pennini, do hereby certify I have electronically filed this document on
June __, 2006, with delivery to :

Scott Lathrop, Esq.
Scott A. Lathrop & Associates
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Groton, MA 01450

Carl H. Gluek, Esq.
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55 Public Square Building, 19th Floor
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Kathleen A. Pennini

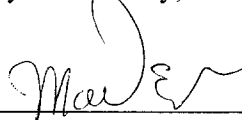
38. Is there any reason you cannot reach a verdict in this case based only on the facts and the law?

Respectfully submitted,

For the Defendants,

**INTERNATIONAL BROTHERHOOD
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25,**

By its attorney,



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Boston, MA 02108-1804

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Date: June 19, 2006

CERTIFICATE OF SERVICE

I, Matthew E. Dwyer, do hereby certify I have electronically filed this document on June 19, 2006, with delivery to :

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